1 2	NICHOLAS A. TRUTANICH United States Attorney Nevada Bar No. 13644	
3	DANIEL D. HOLLINGSWORTH Assistant United States Attorney	
4	Nevada Bar No. 1925 501 Las Vegas Boulevard South, Suite 1100	
5	Las Vegas, Nevada 89101 Telephone: 702-388-6336	
6	Email: Daniel.Hollingsworth@usdoj.gov Attorneys for the United States of America	
7		
8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
9		
10	UNITED STATES OF AMERICA ,	2:13-CR-355-GMN-CWH
11	Plaintiff,	Government's Unopposed Motion To Extend the Time to File its Motion
12	v.	Regarding Honeycutt
13	GREGORY VILLEGAS, aka Ray Matsui,	(First Request)
14	aka Ray Mathis,	
15	Defendant.	
16	The United States of America respectfully moves this Court for an Order extending	
17	the time for the government to file its motion regarding <i>Honeycutt</i> as ordered in ECF No.	
18	385. The government requests an extension of time to and including April 12, 2019. This is	
19	the first request.	
20	The grounds for extending the time are as follows.	
21	On March 25, 2019, the undersigned counsel called Wendi Overmyer, counsel for	
22	defendant, who agreed to this extension of time.	
23	The undersigned has a large and active case load. Undersigned has had many tightly	
24	scheduled deadlines with the court for complex issues that have taken large amounts of time	
25	and resources to complete. Undersigned has worked extremely hard and efficiently to meet	
26	all the deadlines, but he has not had time to complete the motion.	
27	The Asset Forfeiture Unit (AFU) in the United States Attorney's Office for the	
28	District of Nevada (USAO) is understaffed. AFU lacks two paralegal specialists and is in the	
	1	

1	process of training a new forfeiture Assistant United States Attorney (AUSA) in Las Vegas	
2	while still short one AUSA in Reno, Nevada. Between the lack of staff, the lack of forfeiture	
3	AUSAs, and the criminal forfeiture workload, the forfeiture work in the USAO has backed	
4	up significantly. The undersigned is doing the best he can under the circumstances.	
5	This Motion is not submitted solely for the purpose of delay or for any other	
6	improper purpose.	
7	This Court should grant an extension of time to, and including, April 12, 2019, for	
8	the United States to its motion regarding <i>Honeycutt</i> as ordered in ECF No. 385.	
9	DATED: March 25, 2019.	
10 11	NICHOLAS A. TRUTANICH United States Attorney	
12	/s/ Daniel D. Hollingsworth DANIEL D. HOLLINGSWORTH	
13	Assistant United States Attorney	
14	IT IS SO ORDERED.	
15	DATED this 27 day of March, 2019.	
16 17	Mar. Canada	
18	Glorja/M. Navarro, Chief Judge UMTED STATES DISTRICT COURT	
19		
20		
21		
22		
23		
24		
25		
26		
27		

CERTIFICATE OF SERVICE

A copy of the foregoing was served upon counsel of record via Electronic Filing on March 25, 2019.

/s/ Heidi L. Skillin
HEIDI L. SKILLIN
Asset Forfeiture Paralegal